

1 DEVERIE J. CHRISTENSEN, ESQ.
Nevada State Bar No. 6596
2 KIRSTEN A. MILTON, ESQ.
Nevada State Bar No. 14401
3 **JACKSON LEWIS P.C.**
300 S. Fourth Street, Suite 900
4 Las Vegas, Nevada 89101
5 Tel: (702) 921-2460
Fax: (702) 921-2461
6 Email: Deverie.Christensen@jacksonlewis.com
Email: Kirsten.Milton@jacksonlewis.com
7

8 *Attorneys for Defendants Wood Residential, LLC,*
Wood Partners, LLC, and Wood Real Estate
9 *Investors, LLC*

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 VANESSA NELSON

13 Plaintiff,

14 vs.

15 WOOD RESIDENTIAL, LLC; WOOD
16 PARTNERS, LLC; WOOD REAL ESTATE
17 INVESTORS, LLC; and DOES 1-50,
inclusive,

18 Defendants.

Case No. 2:24-cv-00419-ART-BNW

**STIPULATION TO EXTEND
DEADLINE TO SUBMIT A PROPOSED
DISCOVERY PLAN AND
SCHEDULING ORDER**

(Second Request)

19 IT IS HEREBY STIPULATED by and between the parties, through their respective counsel,
20 to extend the current deadline, June 7, 2024, one week to June 14, 2024, for the parties to file a
21 proposed Discovery Plan and Scheduling Order.

22 1. The Court previously granted the Parties' request to extend the deadline for
23 Defendants to file responses to the Amended Complaint and to complete the FRCP 26(f) by June
24 7, 2024, considering undersigned Defense Counsel's unexpected medical emergency. ECF No. 26.

25 2. Undersigned Defense Counsel returned to the office on June 6, 2024, and that same
26 day the parties conducted the FRCP 26(f) conference, discussed the items required by the Rule, and
27 discussed discovery given the individual and class/collective claims in this case.

28 3. Given the delay in Defense Counsel's return to the office until June 6 due to her

1 medical emergency, the parties need one additional week to complete the draft discovery plan and
2 scheduling order to submit for the Court's consideration.

3 4. This is the second request to extend the deadline to file the proposed Discovery Plan
4 and Scheduling Order.

5 5. This request is made in good faith and not for the purpose of delay.

6 Dated this 7th day of June, 2024.

7 RAFII & ASSOCIATES, P.C.

JACKSON LEWIS P.C.

8 /s/ Jason Kuller

/s/ Deverie J. Christensen

9 Jason Kuller, Esq., Bar No. 1224
10 Shay Degenan, Esq., Bar No. 16397
11 1120 N. Town Center Drive, Suite 130
Las Vegas, Nevada 89144
Attorneys for Plaintiff

Deverie J. Christensen, Esq., Bar No. 6596
Kirsten A. Milton, Esq., Bar No. 14401
300 S. Fourth Street, Suite 900
Las Vegas, Nevada 89101
Attorneys for Defendants

12
13 **ORDER**

14 IT IS HEREBY ORDERED that the deadline to file a proposed Discovery Plan and
15 Scheduling Order is continued to Friday, June 14, 2024.

16 Dated this 10 day of June, 2024.

17
18 
United States District Court/Magistrate Judge

19 4878-0033-3766, v. 1